

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WESTERN PA CHILD CARE, LLC, :
PA CHILD CARE, LLC, MID-ATLANTIC :
YOUTH SERVICES CORP., CONSULTING :
INNOVATIONS AND SERVICES, INC., :
GLADSTONE PARTNERS, LP and GREGORY R.:
ZAPPALA, :

Plaintiffs

v.

ROBERT J. POWELL, DEBRA POWELL, :
JILL MORAN, THE POWELL LAW GROUP, :
P.C., VISION HOLDINGS, LLC, JANE SEBELIN, :
SEBELIN LAW OFFICES, P.C., JONATHAN :
LANG; MATTHEW SLOCUM, and THE :
SLOCUM FIRM, P.C. :

Defendants

NOTICE OF VOLUNTARY DISMISSAL OF MATTHEW SLOCUM AND THE SLOCUM
FIRM, P.C.

AND NOW, come Plaintiffs, Western PA Child Care, LLC, PA Child Care, LLC, Mid-Atlantic Youth Services Corp., Consulting Innovations and Services, Inc., Gladstone Partners, LP and Gregory R. Zappala, and in reliance on the declaration attached hereto as Exhibit A, give notice of the voluntary dismissal of Matthew Slocum and The Slocum Firm, P.C., **WITHOUT PREJUDICE.**

Respectfully submitted,

/s/ Bernard M. Schneider
Bernard M. Schneider
Counsel for Plaintiffs

PA ID #32245
BRUCKER SCHNEIDER & PORTER
FIRM ID # 789
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WESTERN PA CHILD CARE, LLC, PA CHILD
CARE, LLC, MID-ATLANTIC YOUTH
SERVICES CORP., CONSULTING
INNOVATIONS AND SERVICES, INC.,
GLADSTONE PARTNERS, LP and GREGORY
R. ZAPPALA,

Plaintiffs,

v.

ROBERT J. POWELL, DEBRA POWELL, JILL
MORAN, THE POWELL LAW GROUP, P.C.,
VISION HOLDINGS, LLC, JANE SEBELIN,
SEBELIN LAW OFFICES, P.C., MATTHEW
SLOCUM and THE SLOCUM FIRM, P.C.,

Defendants.

CIVIL ACTION NO. 2:14-cv-968

Honorable Joy Flowers Conti

DECLARATION OF MATTHEW SLOCUM

I, Matthew Slocum, on behalf of myself and the Slocum Firm, P.C., hereby
declare as follows:

1. I am over 21 years of age and have personal knowledge of the facts set forth below.
2. I am a principal of The Slocum Firm, P.C.
3. I understand that by offering the following statement, Plaintiffs in the above-captioned case will dismiss, without prejudice, the claims asserted against me and the Slocum Firm, P.C. in this case.



4. I make this statement without any admission of any wrongdoing, and, in fact, believe that the Amended Complaint states no claim against me and the Slocum Firm, P.C.

5. Paragraph 164 of the Amended Complaint filed in the above-captioned action defines "Avoca Fees" as follows: "PLG is to receive approximately \$150 million to \$200 million in contingent fees from the Tort Claims Trust for the *In re Avoca Litigation*. ('Avoca Fees.')

6. Neither I nor the Slocum Firm, P.C., have received any Avoca Fees, have any current claim to the Avoca Fees, and will, in the future have no claim to the Avoca Fees.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury that the foregoing is true and correct.

Executed on August 28th, 2014

Scranton, Pennsylvania



MATTHEW SLOCUM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice was served on all counsel of record on the 29th day of August, 2014 by ECF Notice.

BRUCKER SCHNEIDER & PORTER

By: /s/ Bernard M. Schneider
Bernard M. Schneider
Counsel for Plaintiffs

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